

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

FILED
APR 07 2010

[Signature]
CLERK

UNITED STATES OF AMERICA, CR09-40129

Plaintiff,

SUPERSEDING INDICTMENT
(REDACTED)

vs.

BRANDON QUINCY THOMPSON,
a/k/a Terence Maceo Clay, Jr.,
a/k/a "Kadafi,"
a/k/a Hanees Rashid King,
a/k/a Hanees Rasid King, and
MEGAN MARIE HAYES,

Defendants.

Sex Trafficking of Children; Sex
Trafficking by Force, Fraud, and Coercion;
Transportation of Children for Criminal
Sexual Activity; Solicitation to Murder
Federal Witness; Obstruction of Sex
Trafficking Enforcement; Sexual
Exploitation of a Child; Transportation of
Child Pornography; Possession of Child
Pornography; Possession of Firearm in
Relation to Federal Crime of Violence;
Fraudulent Use of Social Security
Number; Aggravated Identity Theft

18 U.S.C. §§ 2(a), 2(b), 373, 924(c)(1)(A),
1028A(a)(1), 1512(a)(1), 1591(a)(1),
1591(a)(2), 1591(b)(1), 1591(b)(2), 1591(d),
2251(a), 2252A(a)(2)(A), 2252A(a)(5)(B),
2256(8)(A) and 2423(a)
42 U.S.C. § 408(a)(7)(B)

The Grand Jury charges:

COUNT 1.

(Sex Trafficking of a Child - Child Victim #1)

Beginning on or about April 1, 2009, and continuing through on or about
July 31, 2009, all dates being approximate and inclusive, in the District of South
Dakota and elsewhere, in and affecting interstate and foreign commerce,

Defendants Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a “Kadafi,” a/k/a Hanee Rashid King, a/k/a Hanee Rasid King, and Megan Marie Hayes, aiding and abetting one another and others known and unknown to the Grand Jury, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, to-wit: Child Victim #1, whose identity is known to the Grand Jury, knowing and recklessly disregarding that Child Victim #1 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and did benefit, financially and by receiving anything of value from participation in a venture engaged in such acts, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(a)(2), and 1591(b)(2), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT 2.
(Sex Trafficking of a Child - Child Victim #2)

Beginning on or about August 1, 2008, and continuing through on or about January 31, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, in and affecting interstate and foreign commerce, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a “Kadafi,” a/k/a Hanee Rashid King, a/k/a Hanee Rasid King, did knowingly and intentionally recruit, entice, harbor, transport, provide, and obtain, by any means a person, to-wit: Child Victim #2, whose identity is known to the Grand Jury, knowing that Child Victim #2 had not attained the age of 18 years, and knowing

that force, fraud, and coercion would be used to cause Child Victim #2 to engage in a commercial sex act, and knowing that Child Victim #2 would be caused to engage in a commercial sex act, and did benefit, financially and by receiving anything of value from participation in a venture engaged in such acts, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(a)(2), 1591(b)(1), and 1591(b)(2), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT 3.
(Transporting a Child for
Criminal Sexual Activity - Child Victim #2)

Beginning on or about August 1, 2008, and continuing through on or about January 31, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Haneë Rashid King, a/k/a Haneë Rasid King, did knowingly transport an individual who had not attained the age of 18 years, to-wit: Child Victim #2, whose identity is known to the Grand Jury, in interstate and foreign commerce, with the intent that Child Victim #2 engage in prostitution, and in any sexual activity for which a person can be charged with a criminal offense in violation of 18 U.S.C. § 2423(a), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT 4.
(Sex Trafficking of a Child - Child Victim #3)

Beginning on or about October 1, 2009, and continuing through on or about November 21, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, in and affecting interstate and foreign commerce, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Hanee Rashid King, a/k/a Hanee Rasid King, and did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, to-wit: Child Victim #3, whose identity is known to the Grand Jury, knowing and recklessly disregarding that Child Victim #3 had not attained the age of 18 years and that Child Victim #3 would be caused to engage in a commercial sex act, and did benefit, financially and by receiving anything of value from participation in a venture engaged in such acts, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(a)(2), and 1591(b)(2), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT 5.
(Transporting a Child for
Criminal Sexual Activity - Child Victim #3)

Beginning on or about October 1, 2009, and continuing through on or about November 21, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Hanee Rashid King, a/k/a Hanee

Rasid King, did knowingly transport an individual who had not attained the age of 18 years, to-wit: Child Victim #3, whose identity is known to the Grand Jury, in interstate and foreign commerce, with the intent that Child Victim #3 engage in prostitution, and in any sexual activity for which a person can be charged with a criminal offense in violation of 18 U.S.C. § 2423(a), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT 6.
(Sex Trafficking of a Child - Child Victim #4)

Beginning on or about April 1, 2009, and continuing through on or about July 31, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, in and affecting interstate and foreign commerce, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a “Kadafi,” a/k/a Hane Rashid King, a/k/a Hane Rasid King, and did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, to-wit: Child Victim #4, whose identity is known to the Grand Jury, knowing and recklessly disregarding that Child Victim #4 had not attained the age of 18 years and that Child Victim #4 would be caused to engage in a commercial sex act, and did benefit, financially and by receiving anything of value from participation in a venture engaged in such acts, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(a)(2), and 1591(b)(2), and did aid, abet, counsel,

command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT 7.
(Sex Trafficking of a Child - Child Victim #5)

Beginning on or about July 1, 2009, and continuing through on or about October 31, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, in and affecting interstate and foreign commerce, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Hanee Rashid King, a/k/a Hanee Rasid King, and did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, to-wit: Child Victim #5, whose identity is known to the Grand Jury, knowing and recklessly disregarding that Child Victim #5 had not attained the age of 18 years and that Child Victim #5 would be caused to engage in a commercial sex act, and did benefit, financially and by receiving anything of value from participation in a venture engaged in such acts, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(a)(2), and 1591(b)(2), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT 8.
(Sex Trafficking of a Child - Child Victim #6)

Beginning on or about July 1, 2009, and continuing through on or about October 31, 2009, all dates being approximate and inclusive, in the District of

South Dakota and elsewhere, in and affecting interstate and foreign commerce, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a “Kadafi,” a/k/a Haneer Rashid King, a/k/a Haneer Rasid King, and did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, to-wit: Child Victim #6, whose identity is known to the Grand Jury, knowing and recklessly disregarding that Child Victim #6 had not attained the age of 18 years and that Child Victim #6 would be caused to engage in a commercial sex act, and did benefit, financially and by receiving anything of value from participation in a venture engaged in such acts, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(a)(2), and 1591(b)(2), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT 9.
(Sex Trafficking of a Child - Child Victim #7)

Beginning on or about November 1, 2009, and continuing through on or about November 21, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, in and affecting interstate and foreign commerce, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a “Kadafi,” a/k/a Haneer Rashid King, a/k/a Haneer Rasid King, and did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, to-wit: Child Victim #7, whose identity is known to the Grand Jury, knowing and recklessly disregarding that Child Victim #7 had not

attained the age of 18 years during the relevant time period and that Child Victim #7 would be caused to engage in a commercial sex act, and did benefit, financially and by receiving anything of value from participation in a venture engaged in such acts, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(a)(2), and 1591(b)(2), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT 10.

(Sex Trafficking of a Child - Child Victim #8)

Beginning on or about November 1, 2009, and continuing through on or about November 21, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, in and affecting interstate and foreign commerce, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Hanee Rashid King, a/k/a Hanee Rasid King, and did knowingly and intentionally recruit and entice, and did attempt to do the same, by any means a person, to-wit: Child Victim #8, whose identity is known to the Grand Jury, knowing and recklessly disregarding that Child Victim #8 had not attained the age of 18 years and intending that Child Victim #8 would be caused to engage in a commercial sex act, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(b)(2), and 1594(a) and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT 11.

(Sex Trafficking by Force, Fraud, or Coercion)

Beginning on or about August 1, 2008, and continuing through on or about January 31, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, in and affecting interstate and foreign commerce, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Haneer Rashid King, a/k/a Haneer Rasid King, did knowingly and intentionally recruit, entice, harbor, transport, provide, and obtain, by any means a person, to-wit: M.P., whose identity is known to the Grand Jury, knowing that force, fraud, and coercion would be used to cause M.P. to engage in a commercial sex act, and did benefit, financially and by receiving anything of value from participation in a venture engaged in such acts, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(a)(2), and 1591(b)(1), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT 12.

(Sex Trafficking by Force, Fraud, or Coercion)

Beginning on or about July 1, 2009, and continuing through on or about September 30, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, in and affecting interstate and foreign commerce, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Haneer Rashid King, a/k/a Haneer Rasid King, did knowingly and

intentionally recruit, entice, harbor, transport, provide, obtain, and maintain, by any means a person, to-wit: J.B., whose identity is known to the Grand Jury, knowing and recklessly disregarding that means of force, threats of force, fraud, and coercion would be used to cause J.B. to engage in a commercial sex act, and did benefit, financially and by receiving anything of value from participation in a venture engaged in such acts, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(a)(2), and 1591(b)(1), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT 13.
(Obstruction of Sex Trafficking Enforcement)

Beginning on or about November 20, 2009, and continuing through on or about April 6, 2010, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Haneë Rashid King, a/k/a Haneë Rasid King, did obstruct, attempt to obstruct, and did interfere with and prevent the enforcement of 18 U.S.C. § 1591 et seq., in violation of 18 U.S.C. § 1591(d).

COUNT 14.
(Solicitation to Murder Federal Witness)

Beginning on or about February 1, 2010, and continuing through on or about April 6, 2010, all dates being approximate and inclusive, in the District of South Dakota, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Haneë Rashid King, a/k/a Haneë Rasid King, with

intent that another person engage in conduct constituting a felony that has as an element the use, attempted use, and threatened use of physical force against another person, in violation of the laws of the United States and under circumstances strongly corroborative of that intent, did solicit, command, induce, and otherwise endeavor to persuade such other person to engage in such conduct. Specifically, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Haneer Rashid King, a/k/a Haneer Rasid King, did solicit, command, induce, and otherwise endeavor to persuade another person to murder an individual, Witness #1, whose identity is known to the Grand Jury, intending to prevent that individual from testifying against Defendant in this case, in violation of 18 U.S.C. §§ 373 and 1512(a)(1).

COUNT 15.
(Solicitation to Murder Federal Witness)

Beginning on or about February 1, 2010, and continuing through on or about April 6, 2010, all dates being approximate and inclusive, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Haneer Rashid King, a/k/a Haneer Rasid King, with intent that another person engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use of physical force against another person, in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce, and otherwise endeavor to persuade such other person to engage in such conduct. Specifically, Defendant

Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a “Kadafi,” a/k/a Haneer Rashid King, a/k/a Haneer Rasid King, did solicit, command, induce, and otherwise endeavor to persuade another person to murder an individual, Witness #2, whose identity is known to the Grand Jury, intending to prevent that individual from testifying against Defendant in this case, in violation of 18 U.S.C. §§ 373 and 1512(a)(1).

COUNT 16.
(Sexual Exploitation of a Child)

Beginning on or about June 1, 2009, and continuing through on or about October 31, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a “Kadafi,” a/k/a Haneer Rashid King, a/k/a Haneer Rasid King, did intentionally employ, use, persuade, induce, and entice a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and that such visual depiction was transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate commerce, in violation of 18 U.S.C. § 2251(a).

COUNT 17.
(Transportation of Child Pornography)

Beginning on or about June 1, 2009, and continuing through on or about October 31, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Haneer Rashid King, a/k/a Haneer Rasid King, did knowingly transport child pornography, as defined in 18 U.S.C. § 2256(8)(A), using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means, including by computer, all in violation of 18 U.S.C. § 2252A(a)(2)(A).

COUNT 18.
(Possession of Child Pornography)

Beginning on or about June 1, 2009, and continuing through on or about October 31, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Haneer Rashid King, a/k/a Haneer Rasid King, did knowingly possess e-mails, text messages, and a BlackBerry hard drive that contained images of child pornography that had been mailed and shipped and transported in interstate and foreign commerce by any means, including by computer, using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means, all in violation of 18 U.S.C. §§ 2252A(a)(5)(B) and 2256(8)(A).

COUNT 19.
(Possession of Firearm in Relation
to Federal Crime of Violence)

Beginning on or about July 1, 2008, and continuing through on or about November 21, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Haneer Rashid King, a/k/a Haneer Rasid King, did, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, use and carry a firearm, and in furtherance of such crime did possess a firearm, in violation of 18 U.S.C. § 924(c)(1)(A).

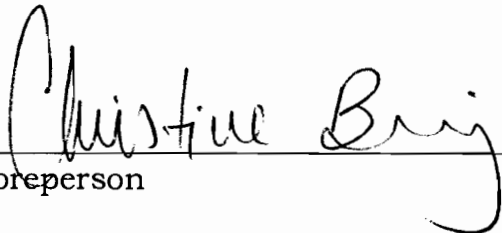
COUNT 20.
(Fraudulent Use of Social Security Number)

Beginning on or about February 1, 2009, and continuing through on or about November 21, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Haneer Rashid King, a/k/a Haneer Rasid King, did, with unlawful intent and with the intent to deceive, falsely represent that Social Security number XXX-XX-4617 was assigned to him, when such number was not assigned to him, in violation of 42 U.S.C. § 408(a)(7)(B).

COUNT 21.
(Aggravated Identity Theft)

Beginning on or about February 1, 2009, and continuing through on or about November 21, 2009, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, Defendant Brandon Quincy Thompson, a/k/a Terence Maceo Clay, Jr., a/k/a "Kadafi," a/k/a Haneë Rashid King, a/k/a Haneë Rasid King, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to-wit: the Social Security number belonging to Terence Maceo Clay, Jr. Defendant did so in relation to the commission of a felony enumerated in 18 U.S.C. § 1028A(c)(11), to-wit: fraudulent use of Social Security number as charged in Count 20 of this Superseding Indictment, all in violation of 18 U.S.C. § 1028A(a)(1).

A TRUE BILL:



Foreperson

BRENDAN V. JOHNSON
UNITED STATES ATTORNEY

By: 